

EXHIBIT A

COPY

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
EDMUND BRYAN,

Plaintiff,

-against-

No. 07 Civ. 7300 (SHS)

ECF Case

MEMORIAL SLOAN-KETTERING CANCER
CENTER,

Defendant.

-----X

April 29, 2008
10:10 A.M.

Deposition of Defendant, by

RUPERT GILLETTE, taken by Plaintiff, pursuant
to Notice, at the offices of The Scott Firm,
55 Washington Street, Suite 705, Brooklyn, New
York 11201, before Charisse Romeo, a Shorthand
Reporter and Notary Public within and for the
State of New York.

ARTAS PASCULLO, President



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1 R. Gillette

2 Q. When you say keep a record?

3 A. Of all mistakes that staff makes,
4 I'll get a copy of like sometimes they will
5 assemble trays or like in a situation like
6 this, the day shift will give me a copy,
7 something like that.

8 Q. Okay.

9 A. And I have a file that I just
10 keep all the files in. Reason for keeping
11 that is that if a particular staff continues
12 to make mistakes, you know, I have copies of
13 and I can show the staff all the mistakes they
14 have made, so it is just -- I just keep it in
15 a file, all right?

16 Q. Did you tape this up on a wall
17 somewhere in the unit?

18 A. No. There is no reason to do
19 that, no.

20 Q. Did you give a copy of this to
21 Edmund Bryan?

22 A. No. I don't give staff -- if
23 staff makes a mistake and I get a copy of
24 whatever the mistake is, I would show the
25 staff, but I would keep it in a file.

1 R. Gillette

2 whatever the mistake is. They'll understand
3 and I'll take this specific paper and I'll
4 file it.

5 Q. So this was never taped up in the
6 unit?

7 A. Absolutely not. No reason to.

8 Q. And you didn't take it down after
9 Mr. Bryan received his right to sue letter
10 from the EEOC?

11 MS. KALE: Objection.

12 A. Take what down?

13 Q. Take the document that is in your
14 hand down?

15 A. It was never taped up or pasted
16 up in the unit.

17 MR. SCOTT: Mark this for
18 identification.

19 (Document marked Plaintiff's
20 Exhibit F for identification, as
21 of this date.)

22 Q. Mr. Gillette, take a look at that
23 document, it has been marked as Plaintiff's
24 Exhibit F, and let me know when you are done.

25 MS. KALE: I would just like the